REMARKS

Reconsideration of the application is requested.

Claims 12-15 and 17-29 are now in the application. Claims 12-15 and 17-29 are subject to examination. Claims 12-14, 18-21, 23-25, and 27 have been amended. Claims 28 and 29 have been added. Claim 16 has been canceled to facilitate prosecution of the instant application.

Some of the claims have been amended to more accurately describe the invention. Applicant's comments regarding the amendments and support therefore are listed below.

Claim 12:

- "by the packet-oriented exchange" has been shifted as its meaning has not been clear before.
- The definite article before "signaling information" has been removed to clearly distinguish the 3 different types of signaling information treated in claim 12.
- Signaling information from the PRA cannot be processed "as a BRA", what is meant is that it can be processed as "signaling information of a BRA". This should be immediately clear, support can also be found in claim 22.
- "a BRA ISDN connection" is discussed with respect to the processing and at the same time "BRA ISDN connections" are discussed, however the relation between these items is not clear. This is amended by introduction of a "plurality of BRA ISDN connections". The PRA ISDN connection is represented by a

plurality of BRA ISDN connections. Support can be found in e.g. by fig. 2 and the specification paragraph [0027], lines 11-14. "The BRA ISDN connection" referenced is one thereof.

- "The transferred signaling information" is "the signaling information transferred from the PRA ISDN connection" mentioned before, what is obvious, this is also supported by the amended claim 1 of the WO application.
- The adapting of the signaling information mentioned above is in accordance with the ISDN connection type of the BRA ISDN connection, and not the PRA connection. Support can be found in the amended claim 1 of the WO application.

The amendments of claim 12 are to improve clarity and to correct an important typo (incorrect "PRA" instead of "BRA"). The amendments put claim 12 in a form appropriate for a possible later appeal. The amendments have not been made to overcome the rejection of the Examiner.

Claim 13:

Second limitation:

According to claim 2 of the priority document the "different ISDN connections" refer to BRA and PRA ISDN connections. The second limitation of claim 13 has been found to be unclear even under consideration of claim 2 of the WO application. Therefore the original translation of this limitation has been

considered and reintroduced into amended claim 13. The translation of the second limitation is:

"the connection type of the ISDN connection (PRA) differs from the connection type, by which ISDN connections are represented in the packet-oriented exchange".

In fact, the amended second limitation will be naturally fulfilled, as the PRA ISDN connection is represented by BRA connections according to claim 12, and those BRA connections will have a BRA connection type, which differs from the PRA connection type. If you see this argument as sufficient, we also would be happy, if the second limitation of claim 13 could simply be deleted with reference to claim 2 of the WO application and claim 12 of the US application. Support could also be found in paragraph [0016] of the specification.

Third limitation:

The amendments of the third limitation of claim 13 find support in claim 2 of the WO application.

Claim 14:

- "The signaling information" more precisely is "the exchanged signaling information" used in claims 12 and 13.

- The expressions “ensues to a map” causes the subsequent problem, that claim 15 requires “the mapping”. That is why “mapping” has been introduced, Support is by the translation of claim 3 of the WO application.
- The translation of mapping subjects “on top of each other” is simply wrong and leads to problems of correct understanding. The meaning of the German expression “aufeinander” seems already covered by the word “mapping”. Therefore the expression has been removed.

Claim 16:

Claim 16 has been cancelled, as its limitations seem to be already incorporated in claim 12.

Claim 18:

Claim 18 has been adapted due to amended claim 14.

Claim 19:

Claim 19 has been amended on the base of the translation of claim 8 of the WO application. “The ISDN connection” is “the PRA ISDN connection” of claim 12, what should be immediately clear. The term “permanently” has been reintroduced, as it reflects a technical limitation of the ISDN access.

Claim 20:

Claim 20 has been found to be unclear due to at least a grammar fault. Amended claim 20 now relates to claim 14, as it needs the map/mapping of

data channels. Support of the amendment is by the translation of claim 9 of the WO application.

Claim 21:

The amendment of claim 21 is due to amended claim 20.

Claim 23:

The wrong translation “on top of each other” has been removed with same arguments as for amended claim 14.

Claim 24:

The mapping of data channels has been introduced in claim 23, therefore, reference and wording (“mapping” instead of “map”) has been changed.

Claim 25:

A typo, obviously missing “at”, has been corrected, support is also by translation of claim 14 of the WO application.

Claim 27:

A typo (“IAD” instead of “LAD”) has been corrected, which also has been detected by the examiner.

Claim 28:

Support is found at Fig. 2, at paragraph [0027], lines 11-17, lines 37-39, and at paragraph [0018], lines 1-6, lines 18-20.

Claim 29:

Support is found at Fig 4 and at paragraph [0029], lines 10-26

Under the heading "Claim Rejections – 35 USC § 103" on page 2 of the above-identified Office Action, claims 12-18 and 20-27 have been rejected as being obvious over U.S. Patent No. 6,434,139 to Liu et al. in view of U.S. Patent No. 7,173,910 to Goodman and further in view of U.S. Patent no. 7,046,683 to Zhao under 35 U.S.C. § 103. Applicant respectfully traverses.

Applicants comments are listed below.

Claim 12 has the following structure:

A method for exchanging signaling information between a PRA ISDN connection and a packet-oriented exchange via a peripheral adapter, comprising:

(a) processing by the packet-oriented exchange signaling information transferred from the PRA ISDN connection as signaling information of a BRA ISDN connection out of a plurality of BRA ISDN connections;

(b) adapting in the peripheral adapter the signaling information transferred from the PRA ISDN connection in accordance with the ISDN connection type of the BRA ISDN connection; and

(c) adapting signaling information transferred from the packet-oriented exchange to the peripheral adapter in accordance with the ISDN connection type of the PRA ISDN connection,

(d) wherein the PRA ISDN connection is represented by said plurality of BRA ISDN connections in the packet-oriented exchange.

As already argued Liu at least does not teach or suggest limitations (a), (b) and (d) of claim 12. Applicant asks the Examiner to review the comments presented in the previously submitted response since those comments are still applicable.

With respect to Liu the Examiner again cites Fig. 1 and col. 4, lines 4-22 of Liu and concludes that "Liu teaches a gateway 22 for exchanging ISDN signaling information between a PRI or PRA and a packet-oriented exchange such in the packet data network 10".

However, as argued earlier and already filed with the USPTO, this is not disclosed by Liu:

> The examiner sees the trunk group 20 of Liu as "a primary rate connection (access, or interface)". However, in the language of Liu a T1 or E1 trunk group like trunk group 20 and trunk group 18 is "carrying PCM digital voice traffic on multiplexed channels at a primary rate of 1.544 Mbps (T1), 2,048 Mbps (E1), or better." It is remarked, that Liu only refers to the transmission rate in the digital transmission hierarchy of PCM technology. But Liu does not

characterize in particular the trunk group 20 as being a PRA ISDN connection! This is a not acceptable interpretation of the character of the trunk group 20 of Liu. Liu does not disclose trunk group 20 as being a PRA ISDN connection, what would include in particular a special subscriber signaling method and a special channel structure. However, in the document of Liu, there is no hint for such interpretation. On the contrary as Fig. 1 shows, subscriber equipment of Liu is connected via subscriber lines 16 to the end office 12 of Liu, whereas trunk groups as trunk group 18 and 20 are used on the network side of the end office 12 of Liu. With that, Liu even guides away from the examiner's interpretation of the character of Liu's trunk group 20. According to Liu and according to the knowledge of the artisan network connections are implemented via trunks or trunk groups and are using appropriate interexchange signaling (e.g. ISUP), they are not implemented via subscriber signaling (e.g. DSS1) requiring interfaces as a PRA ISDN connection is.

It may also be remarked, that Liu does not provide any details on a packet-oriented exchange in his packet data network 10. This implies e.g., that limitations (a) and (d) are not disclosed or made evident by Liu!

The Examiner also states that "Liu fails to explicitly teach the connection between gateway 22 and gateway 24 is a BRA connection". However, due to the fact that the gateways 22 and 24 of Liu are H.323 gateways, it is clear, that these gateways towards and from the packet data network use H.323 signaling and not ISDN

signaling as provided and needed by a BRA ISDN connection. This implies that limitation (b) is not disclosed or made evident by Liu.

Goodman does not teach or suggest any of limitations (a), (b), and (d) of claim 12:

First, it is remarked that Goodman does not provide any details on a packet-oriented exchange in his VOIP network 12. This implies e.g., that limitations (a) and (d) are not disclosed or made evident by Goodman.

According to Goodman his gateway 16a indeed may be physically connected to test probe 14a via ISDN PRI and may be connected to the VOIP network 12 via ISDN-PRI, CAS T1/E1 or even an analog FXO interface. However, as Goodman states himself these interfaces are "PSTN physical and signaling interfaces". These interfaces are used to get an initial access to an IP based network, as it is well known e.g. for the case of analog PSTN lines, which require modem connections for access to the Internet. If test probe 14a initiates any call, it dials a telephone number corresponding to another test probe, e.g. test probe 14b. And this will cause the gateway 16a to initiate a related VOIP call via e.g. H.323, SIP, MGCP, or H.248 signaling. (Cf. Goodman, col. 4, line 58- col. 5, line 3). Thus the ISDN PRI signaling of the test probes is converted to VOIP signaling and not to ISDN BRI type signaling. Consequently Goodman does not disclose or make evident limitation (b) of claim12, on the contrary Goodman teaches away from using ISDN BRI, as he is interested only in IP based signaling measurements and IP based voice quality measurements.

As already argued Zhao does not teach or suggest any of limitations (a), (b), (c), and (d) of claim12.

As in the prior final office action, the Examiner (cf. page 3 of the office action) maps the trunk board 152 of Zhao to the adapter of our application and the route switch 180 of Zhao to a packet network exchange. However, the whole document of Zhao does not disclose or suggest e.g. a processing of signaling information from a PRA ISDN connection in the route switch board 180 of Zhao as signaling of a BRA ISDN connection. As well no ISDN connection type aware adapting of signaling information in the trunk board 152 of Zhao is disclosed or suggested. Furthermore, no representation of a PRA ISDN connection by a plurality of BRA ISDN connections is disclosed or suggested with respect to the route switch board 180. Citation col. 2, lines 20-40 provides guidance for routing PSTN calls over a packet-based network on base of the elements of Fig. 1. Citation col. 3 lines 4-13 provides general information on call agents. Citation col. 4, lines 50-56 provides the information that a "packet voice gateway" provides an interface between a packet based network and some other type of network or device(s) including PRI and BRI. Citation col. 65, lines 1-12 on the base of Fig. 2 provides the information that gateway 70 connects to central office 24 via a circuit switched trunk 94, gateways 72 and 74 are described to connect to access network devices, and gateways 70, 72, 74 are described as being controlled by call agent 76. Thus in particular the citations of Zhao have no relevance with respect to the discussed limitations of claim 12.

Furthermore, the examiner again sees "bear channel connections" between gateway 70 and gateways 72 and 74, which he interprets as "a basic rate access connection". However, this interpretation is also not acceptable and it is not supported either by the citation (paragraph [0110] or paragraph [0010] of Zhao) or by the whole document of Zhao. The examiner's argument is also not understood, if the Examiner really addresses paragraph [0010] of (applicant's) specification, which refers to the two ISDN interfaces BRA and PRA.

Consequently, also in view of the modified argumentation of the examiner, the overall picture remains unchanged. Zhao does not disclose or make evident any of limitations (a), (b), (c), and (d).

Claim 22:

With respect to claim 22 same arguments as used with respect to claim 12 are applicable.

Applicant believes that it should be clear that one of ordinary skill in the art would not have been guided to the invention as defined by claims 12 or 22 based on the teaching of Liu in view of Goodman and Zhao.

Under the heading "Claim Rejections – 35 USC § 103" on page 4 of the above-identified Office Action, claim 19 has have been rejected as being obvious over

U.S. Patent No. 6,434,139 to Liu et al. in view of U.S. Patent No. 7,173,910 to Goodman and further in view of U.S. Patent no. 7,046,683 to Zhao and further in view of U.S. Patent No. 6,396,840 to Rose et al. under 35 U.S.C. § 103. Applicant respectfully traverses.

Applicant believes the invention as defined by claim 19 would not have been suggested for the reasons given above with regard to claim 12.

It is accordingly believed to be clear that none of the references, whether taken alone or in any combination, either show or suggest the features of claims 12 or 22. Claims 12 and 22 are, therefore, believed to be patentable over the art. The dependent claims are believed to be patentable as well because they all are ultimately dependent on claim 12 or 22.

In view of the foregoing, reconsideration and allowance of claims 12-15 and 17-29 are solicited.

In the event the Examiner should still find any of the claims to be unpatentable, counsel would appreciate receiving a telephone call so that, if possible, patentable language can be worked out.

Please charge any fees that might be due with respect to Sections 1.16 and 1.17 to the Deposit Account of Lerner Greenberg Stemer LLP, No. 12-1099.

Respectfully submitted,

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